

**FILED**

**MAR 02 2017**

Clerk, U.S. District Court  
District Of Montana  
Great Falls

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**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**RAYMOND THOMAS TETZLAFF,  
CRYSTAL BUSBY-TETZLAFF and  
SEAN PATRICK GILMORE,**

**Defendants.**

**CR 17-23-BLG-SPW**

**INDICTMENT**

**CONSPIRACY TO POSSESS WITH  
INTENT TO DISTRIBUTE  
METHAMPHETAMINE**

**(Count I)**

**Title 21 U.S.C. § 846**

**(Penalty: Mandatory minimum ten years to  
life imprisonment, \$10,000,000 fine, and at  
least five years supervised release)**

**POSSESSION WITH INTENT TO  
DISTRIBUTE METHAMPHETAMINE**

**(Count II)**

**Title 21 U.S.C. § 841(a)(1)**

**(Penalty: Mandatory minimum ten years  
to life imprisonment, \$10,000,000 fine, and  
at least five years supervised release)**

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|  | <p><b>FELON IN POSSESSION OF A FIREARM</b><br/> (Counts III and IV)<br/> Title 18 U.S.C. § 922(g)(1)<br/> (Penalty: Ten years imprisonment, \$250,000 fine, and three years supervised release)</p> <p><b>POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME</b><br/> (Counts V and VI)<br/> Title 18 U.S.C. § 924(c)(1)(A)(i)<br/> (Penalty for first conviction—mandatory minimum five years to life imprisonment, consecutive to any other sentence, \$250,000 fine, and five years supervised release. Penalty for second or subsequent conviction—mandatory minimum 25 years to life imprisonment, consecutive to any other sentence, \$250,000 fine, and five years supervised release)</p> <p><b>CRIMINAL FORFEITURE</b><br/> Title 18 U.S.C. § 924(d)</p> <p><b>TITLE 21 PENALTIES MAY BE ENHANCED FOR PRIOR DRUG-RELATED FELONY CONVICTIONS</b></p> |
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**THE GRAND JURY CHARGES:**

**COUNT I**

That beginning in approximately April 2016, and continuing until on or about February 14, 2017, at Billings, in the State and District of Montana, and elsewhere, the defendants, RAYMOND THOMAS TETZLAFF, CRYSTAL BUSBY-TETZLAFF and SEAN PATRICK GILMORE, knowingly and unlawfully

conspired and agreed with each other and other persons, both known and unknown to the Grand Jury, to possess with the intent to distribute, in violation of 21 U.S.C. § 841(a)(1), 500 grams or more of a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 846.

## COUNT II

That beginning in approximately April 2016, and continuing until on or about February 14, 2017, at Billings in the State and District of Montana, the defendants RAYMOND THOMAS TETZLAFF, CRYSTAL BUSBY-TETZLAFF and SEAN PATRICK GILMORE, knowingly possessed, with the intent to distribute, 500 grams or more of a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance and 50 grams or more of actual methamphetamine, and aided and abetted the same, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

## COUNT III

That on February 7, 2017, at Billings, in the State and District of Montana, the defendant, SEAN PATRICK GILMORE, having been convicted of a crime punishable by imprisonment for a term exceeding one year under the laws of the United States, knowingly possessed, in and affecting interstate commerce, a

firearm, that is a Smith and Wesson, model 5906, 9 mm caliber semi-automatic pistol (S/N: TCK4871), and a Mossberg, model 500, 12-gauge slide-action shotgun (S/N: U964906), in violation of 18 U.S.C. § 922(g)(1).

#### COUNT IV

That on February 9, 2017, at Billings, in the State and District of Montana, the defendant, RAYMOND THOMAS TETZLAFF, having been convicted of a crime punishable by imprisonment for a term exceeding one year under the laws of the United States, knowingly possessed, in and affecting interstate and foreign commerce, a firearm, that is a Taurus (Importer: Taurus Int. MFG.) model PT 740 Slim, .40 caliber semi-automatic pistol (S/N: SFY63025), and a Walther, model 4, 7.65 mm (.32 ACP) caliber semi-automatic pistol (S/N: 256585), in violation of 18 U.S.C. § 922(g)(1).

#### COUNT V

That on February 9, 2017, at Billings, in the State and District of Montana, the defendant, RAYMOND THOMAS TETZLAFF, knowingly possessed a firearm, a Taurus (Importer: Taurus Int. MFG.) model PT 740 Slim, .40 caliber semi-automatic pistol (S/N: SFY63025), and a Walther, model 4, 7.65 mm (.32 ACP) caliber semi-automatic pistol (S/N: 256585), in furtherance of a drug trafficking crime that may be prosecuted in a court of the United States, namely

conspiracy to possess with intent to distribute, and possession with intent to distribute methamphetamine, as alleged in Counts I and II above, in violation of 18 U.S.C. § 924(c)(1)(A)(i).

#### COUNT VI

That on February 7, 2017, at Billings, in the State and District of Montana, the defendant, SEAN PATRICK GILMORE, knowingly possessed a firearm, a Smith and Wesson, model 5906, 9 mm caliber semi-automatic pistol (S/N: TCK4871), and a Mossberg, model 500, 12-gauge slide-action shotgun (S/N: U964906), in furtherance of a drug trafficking crime that may be prosecuted in a court of the United States, namely conspiracy to possess with intent to distribute, and possession with intent to distribute methamphetamine, as alleged in Counts I and II above, in violation of 18 U.S.C. § 924(c)(1)(A)(i).

#### FORFEITURE ALLEGATION

Pursuant to 18 U.S.C. § 924(d), the defendants, RAYMOND THOMAS TETZLAFF, CRYSTAL BUSBY-TETZLAFF and SEAN PATRICK GILMORE, shall forfeit to the United States the firearms identified in Counts III, IV, V, and VI.

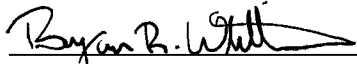
A TRUE BILL.

FOREPERSON SIGNATURE REDACED

FOREPERSON



MICHAEL W. COTTER  
United States Attorney



for JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

Crim. Summons \_\_\_\_\_

Warrant: \_\_\_\_\_

Bail: \_\_\_\_\_

In Federal Custody x 3